

DMD/ycp #18-149

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

GEORGE W. BROWN,

Case No.: 08 CV 1093 LMM

Plaintiff,

-against-

RULE 7.1
STATEMENT

THE BROOKDALE HOSPITAL MEDICAL CENTER,
SANJEEV RAJPAL, M.D., CLASS SURGERY
BROOKLYN GROUP, P.C., THE MOUNT SINAI
HOSPITAL, HOWARD CHOI, M.D., DANIELLE
PERRET, M.D., BRIAN RIORDAN, M.D., NEW
FRANKLIN REHABILITATION & HEALTH CARE
FACILITY, LLC, FRANKLIN CENTER FOR
REHABILITATION & NURSING, INC., FRANKLIN
CENTER FOR REHABILITATION & NURSING,
ISRAEL SHERMAN, WILLIAM DUKE, M.D.,
HILLSIDE MANOR COMPREHENSIVE CARE
CENTER, and THE NEW YORK HOSPITAL
MEDICAL CENTER OF QUEENS,

Defendants.

X

Defendant **THE NEW YORK HOSPITAL OF QUEENS**, by its attorneys,
WAGNER, DOMAN & LETO, P.C., pursuant to Federal Rule of Civil Procedure 7.1, states:

1. The New York Hospital Medical Center of Queens (NYHQ) is a New York not-for-profit corporation whose Trustees are elected by its Members. Under the NYHQ By-Laws, the New York-Presbyterian Healthcare System ("System, Inc.") which is also a New York not-for-profit corporation, is authorized to select the Members of NYHQ who elect the NYHQ Trustees. However, neither System, Inc. nor the Members can direct the operations or management of NYHQ. The NYHQ By-Laws expressly limit the powers of the Members and of System, Inc. The NYHQ Board of Trustees continues to have and exercise the power and authority over the management and operations of NYHQ; and

2. No publicly held corporation owns 10% or more of its stock.

Dated: Mineola, New York
June 18, 2008

Yours, etc.,

WAGNER, DOMAN & LETO, P.C.

Attorneys for Defendants:

NEW YORK HOSPITAL MEDICAL CENTER OF
QUEENS
227 Mineola Boulevard
Mineola, New York 11501
(516) 742-1444

By: 
DIANA M. D'ALESSIO DI LEO

TO:

LEAHEY & JOHNSON, P.C.

Attorneys for Plaintiff
120 Wall Street, Suite 2220
New York, New York 10005
(212) 269-7308

MARTIN, CLEARWATER & BELL, LLP

Attorneys for Defendants:
THE BROOKDALE HOSPITAL MEDICAL CENTER
220 East 42nd Street
New York, New York 10017
(212) 697-3122

BELAIR & EVANS, LLP

Attorneys for Defendants:
SANJEEV RAJPAL, M.D. and
CLASS SURGERY BROOKLYN GROUP, P.C.
61 Broadway - Suite 1320
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(212) 344-3900

WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP

Attorneys for Defendants:

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(212) 490-3000
File No.: 22930.00949

KOPFF, NARDELLI & DOPF, LLP

Attorneys for Defendants:

NEW FRANKLIN REHABILITATION & HEALTH CARE
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REHABILITATION & NURSING, INC., FRANKLIN
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ISRAEL SHERMAN, and WILLIAM DUKE, M.D.

440 Ninth Avenue
New York, New York 10001-1688
(212) 330-0279

**FUREY, FUREY, LEVERAGE, MANZIONE,
WILLIAMS & DARLINGTON, P.C.**

Attorneys for Defendants:

HILLSIDE MANOR COMPREHENSIVE CARE CENTER
600 Front Street
Hempstead, New York 11550-4494
(516) 538-2500

**STATE OF NEW YORK) ss.:
COUNTY OF NASSAU)**

AFFIDAVIT OF SERVICE

YVONNE C. PURSOO, being duly sworn, deposes and says that she is not a party to the within action, is over 18 years of age, and resides at Richmond Hill, New York.

On the 24th day of June 2008, she served a copy of the within **RULE 7.1 STATEMENT** upon the following:

LEAHEY & JOHNSON, P.C.

Attorneys for Plaintiff
120 Wall Street, Suite 2220
New York, New York 10005
(212) 269-7308

MARTIN, CLEARWATER & BELL, LLP

Attorneys for Defendants:
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KOPFF, NARDELLI & DOPF, LLP

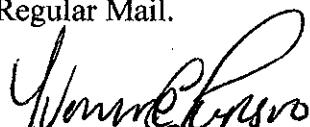
Attorneys for Defendants:
NEW FRANKLIN REHABILITATION & HEALTH CARE
FACILITY, LLC, FRANKLIN CENTER FOR
REHABILITATION & NURSING, INC., FRANKLIN
CENTER FOR REHABILITATION & NURSING,
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**FUREY, FUREY, LEVERAGE, MANZIONE,
WILLIAMS & DARLINGTON, P.C.**

Attorneys for Defendants:

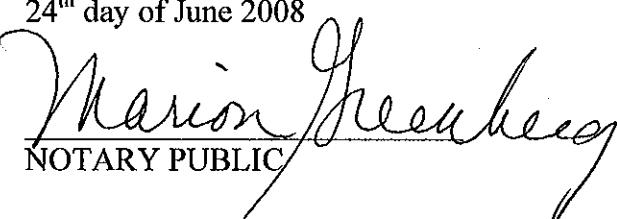
HILLSIDE MANOR COMPREHENSIVE CARE CENTER
600 Front Street
Hempstead, New York 11550-4494
(516) 538-2500

depositing a true copy of same, enclosed in a post-paid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York via First Class Regular Mail.


~~Yvonne C. Pursoo~~

~~YVONNE C. PURSOO~~

Sworn to before me this
24th day of June 2008


NOTARY PUBLIC

MARION GREENBERG
Notary Public, State of New York
No. 4702345
Qualified in Nassau County
Commission Expires 1/31/10

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

GEORGE W. BROWN

Plaintiff

Plaintiff

JULIE BROOKDALE HOSPITAL MEDICAL CENTER, SAN JESÚS RAVARE, M.D., CLASS SURGEON, BROOKDALE GROUP PC, ST. MARY'S MOUNT SINAI HOSPITAL, HOWARD DUCHIN, M.D., DANIELLE S. BERKMAN, M.D., BRIAN RYORDAN, M.D., NEW FRANKLIN REHABILITATION & HEALTH CARE FACILITY, LLC, FRANKLIN CENTER FOR REHABILITATION INC., INNOVATE, INC., FRANKLIN CENTER FOR REHABILITATION & NURSING, ISRAEL L. SHERMAN, WILLIAM COOKE, M.D., BUCKLEBEE MANOR COMPREHENSIVE CARE CENTER, and JOHN NEW YORK HOSPITAL MEDICAL CENTER OF QUEENS.

Defendants

PROOF OF SERVICE

WAGNER, DOMAN & LIPIO, P.C.
ATTORNEYS AT LAW
Attorneys for Plaintiff
227 Mineola Boulevard
Mineola, New York 11501
(516) 261-2222

(TO)

An attorney for:

Service copy of the within

is hereby admitted.

Dated

Amen, NY

PLAINTIFF'S NOTICE

I [] that the within is a certified true copy of:

Notice of Entry entered in the office of the Clerk of the within named court on

I [] that an Order of which the within is a true copy will be presented to the Clerk of the within named court on

One of the judges of the within named Court

On _____ at _____ AM

(Dated)

Yours etc.

WAGNER, DOMAN & LIPIO, P.C.
ATTORNEYS AT LAW

Attorneys for

227 Mineola Blvd.